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**Attorneys for Plaintiff
G & G Closed Circuit Events, LLC**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

G & G Closed Circuit Events, LLC,

Case No. 1:20-cv-01745-JLT-BAM

Plaintiff,

vs.

Oscar Dorado Aguilar.

**STIPULATION AND [PROPOSED]
ORDER RE CONTINUING PRE-
TRIAL CONFERENCE AND
TRIAL**

Defendant.

1 COME NOW Plaintiff G & G Closed Circuit Events, LLC (“G & G”) and
2 Defendant Oscar Aguilar and stipulate as follows:
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4 I. RECITALS

- 5 1. WHEREAS, by stipulation, the Parties’ requested the Court continue the
6 Pre-trial Conference from December 18, 2023 to January 17, 2024
7 because Aguilar had been unresponsive to his counsel Trevor McCann’s
8 several communications since September 22, 2023 (Dkt. 44);
9 2. WHEREAS the Court granted the Parties’ request for an Order
10 continuing the Pre-trial Conference to January 17, 2024 (Dkt. 45);
11 3. WHEREAS the Court advanced the Pre-trial Conference date to January
12 16, 2024 (Dkt. 46);
13 4. WHEREAS trial is currently set for February 27, 2024;
14 5. WHEREAS Aguilar has not responded his attorney Trevor McCann’s
15 two additional emails of December 12 and 14, 2023;
16 6. WHEREAS McCann cannot adequately or properly prepare for or
17 conduct a trial without Aguilar’s input and presence; and
18 7. WHEREAS, on December 29, 2023, McCann informed G & G of his
19 intent to file a motion to be relieved as counsel of record and G & G
20 indicated it would not oppose McCann’s intended motion.
21 8. WHEREAS, G & G presently has a scheduling conflict on January 16,
22 2023. Specifically, G & G’s counsel is to appear and participate in a
23 beach trial before the Honorable Rachel Kovner in the matter of *G&G*
24 *Closed Circuit Events, LLC v. Denis A. Paz, et al.*, Case No. 1:20-cv-
25 04277-RPK-JRC (USDC EDNY) on that particular date.
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1 II. STIPULATION

2 THEREFORE, the Parties stipulate as follows:

- 3 1. Continuation of the Pre-trial Conference and trial to dates set by the
4 Court to allow sufficient time for McCann's motion to be relieved as
5 counsel of record to be heard and the Parties to prepare; and

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7 Respectfully submitted,

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9 Dated: January 2, 2024

10 /s/ Thomas P. Riley

11 **LAW OFFICES OF THOMAS P. RILEY, P.C.**
12 By: Thomas P. Riley
13 Attorneys for Plaintiff
14 G & G Closed Circuit Events, LLC

15 Dated: January 2, 2024

16 /s/ Trevor McCann

17 **COLLINS AND COLLINS, LLP**
18 By: Trevor Brandt McCann
19 Attorneys for Defendant
20 Oscar Dorado Aguilar

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ORDER

2 On reading the Parties' Stipulation, this Court finds good cause to continue to the
3 Pre-trial Conference and trial as follows:

4 Pre-trial Conference is continued from January 16, 2024 to September 3, 2024 at
5 1:30 p.m.

6 Trial is continued from February 27, 2024 to November 19, 2024 at 8:30 a.m.

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8 IT IS SO ORDERED.

9 Dated: January 2, 2024


10 UNITED STATES DISTRICT JUDGE

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